Federal Aviation Administration

508 Procurement and Acquisition Guidance

Introduction

- Section 508 applies to all Federal agencies when they develop, procure, maintain or use electronic and information technology

- Section 508 created binding and enforceable provisions and incorporated those provisions into Federal procurement regulations

- Section 508 technical provisions need to be used in all EIT acquisitions

Training Objectives

- To Understand 508 Federal Procurement Requirements

- To Know FAA Standard Operating Procedures

- To Apply FAA Procurement Policies and Procedures

Training Agenda

- Part 1: FAA Procurement Standard Operating Procedures

- Part 2: FAA Procurement Process
  - FAA Procurement Examples of Section 508 Compliant Products and Services

508 Procurement Requirements

- Applies when FAA develops, procures, maintains or uses EIT on or after June 21, 2001

- Applies to procuring products which comply with applicable Section 508 technical standards

- Requires FAA Agency-Wide Team (i.e., requiring and procurement officials, contractors, technical experts, legal) to verify EIT accessibility

FAA Standard Operating Procedures

FAA Procurement Operating Procedures

- Purchases for EIT

- Exceptions

- EIT is Not Available

- Procurement Factors to Consider

- Common Methods for Market Research

- Procurement Tools for Contract Pre-Award Task

FAA Procurement Team

- Formed to develop policies and procedures to facilitate the implementation of Section 508 within FAA

- Developed 508 Standard Operating Procedures

- Assisted in the development of Section 508 Clauses

- Comprises Members from Lines of Business

Requiring Official

Requiring Official's Role and Responsibilities

- **Identify which standards apply to the procurement**

- **Perform market research to determine the availability of compliant products and services**

- **Document in writing non-availability**

- **Determine in writing Undue Burden**

- **Submit technical specifications and minimum requirements with the purchase request**

Contracting Officer

Contracting Officer's Role and Responsibilities

- **Ensures Screening Information Request, Statement of Work and resulting contract documenting EIT compliance**

- **Maintains records for exceptions, non availability or undue burden determinations**

- **Ensures proper use of the Pre-Award Tools (Exhibit E)**

Standard Operating Procedures

FAA Acquisition Management System (AMS)

- After June 21, 2001, new procurements shall include requirements that have provisions for (EIT)

- **Section 508 Procurement checklist** designed to assist in the:

  - EIT requirement identification

  - Market research documentation

  - Exceptions identification

  - Undue burden documentation

Standard Operating Procedures

508 Procurement Checklist

Standards (Purchases for EIT)

- Identify the Access Board standards that apply to EIT purchase - 1194.21 – 1194.26, 1194.31, 1194.41

Market Research

- After market research, the product is considered:
    - Compliant
    - Partially Compliant
    - Noncompliant
    - EIT is not available (non availability documentation)

Standard Operating Procedures

508 Procurement Checklist

Identify Exceptions:

- EIT acquired by a contractor incidental to a contract

- Systems used for military command, weaponry, intelligence, and crypto logic activities (National Security System)

- "Back Office" equipment used by service personnel for maintenance, repair or occasional monitoring of equipment

- EIT that would impose an undue burden (significant difficulty or expense) on the agency

Standard Operating Procedures

Undue Burden

- Purchase considered a significant difficulty or expense
- Provision of alternative means of access

Documented by:

- Applicable technical provisions of 508 standards cannot be met as a result of undue burden
- Results of market research performed
- The estimated cost of acquiring EIT with explanation including the fact that all agency funds were considered

Standard Operating Procedures

Procurement Evaluation Factors to Consider

- The technical standards are **mandatory** requirements unless product or service is:
- **Non Availability**
- **Exceptions Apply**
  - **All**
  - **Some**
  - **None of the provisions**

Standard Operating Procedures

Purchase Card Section 508 Guidance

- EIT procurements meet 508 standards

- Purchase cardholders currently ensure 508 compliance for all purchases

- FAA Section 508 Requiring Organization Checklist for Purchase Cards (Exhibit D)

Standard Operating Procedures

508 Requiring Organization Checklist for Purchase Cards

- Product/Services available
    - Document 508 compliance
    - Check Buy Accessible from section508.gov website

- Products/Services not available
    - Document non availability

- Products/Services available but exception applies
    - **Purchase Cards shall NOT be used**

Market Research Methods

- Query Government databases that provide information relevant to agency acquisitions
- Review on-line catalogs and product literature published by manufacturers, distributors, and dealers
- Hold presolicitation conferences
- Use technical analysis publications
- Review Government-managed web sites

Standard Operating Procedures

- **Public Announcement/Markey Survey/Screening SIR**
  - Requirement **must comply** with 508 standards
  - Offers provide verification of compliance
- **Section C Statement of Work**
  - Specific 508 standards apply
  - Products/Services contain 508 standards features
  - Provide support documentation in alternative formats
- **Section L Required Submissions**
  - **Must verify** with supporting documentation 508 compliance

Standard Operating Procedures

- **Section M Evaluation Factors**
  - **Must demonstrate** 508 compliance
- **Section J Electronic Information Technology Access Board Standards**
  - Procurement officials and team members need to be familiar with the technical provisions of the 508 standards.

Procurement Example

- Web-Based Training Course
- Target Audience within and outside of FAA
- Assure Web Based Training is 508 Compliant
- 508 Compliance Wording for Statement of Work
- Request Contractor to verify Web Based Training is 508 Compliant

SECTION 508 PROCUREMENT PROCESS

(Exhibit A: FAA Section 508 Procurement Checklist))

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┌──────────────┐              ┌──────────────┐           ┌──────────────┐           ┌──────────────┐
│  Does EIT    │    Yes       │  Eligible for │   Yes     │  Document    │           │  Submit to   │
│  Stds Apply? │ ────────►    │  Exceptions? │ ────────► │  Exception per│ ────────► │  Contracting │
└──────────────┘              └──────────────┘           │              │           │  Officer & FAA│
        │                            │                   │  Section 4   │           │  Legal       │
        │ No                         │ No                └──────────────┘           └──────────────┘
        ▼                            ▼
┌──────────────┐              ┌──────────────┐
│  Disregard   │              │  Identify    │
│  Section 508 │              │  Applicable  │
│  requirement │              │  Standards   │
└──────────────┘              └──────────────┘
                                     │
                                     ▼
                              ┌──────────────┐
                              │ Conduct Market│
                              │  Research    │
                              │  (Exhibit B) │
                              └──────────────┘
                                     │
                                     ▼
                              ┌──────────────┐    No     ┌──────────────┐           ┌──────────────┐
                              │  Available?  │ ────────► │ Document Non-│ ────────► │  Submit to   │
                              └──────────────┘           │  availability │           │  Contracting │
                                     │                   └──────────────┘           │  Officer & FAA│
                                     │ Yes                                          │  Legal       │
                                     ▼                                              └──────────────┘
                              ┌──────────────┐
                              │ Initiate Pre-award│
                              │  Process using│
                              │  (Exhibit E ) tools│
                              └──────────────┘
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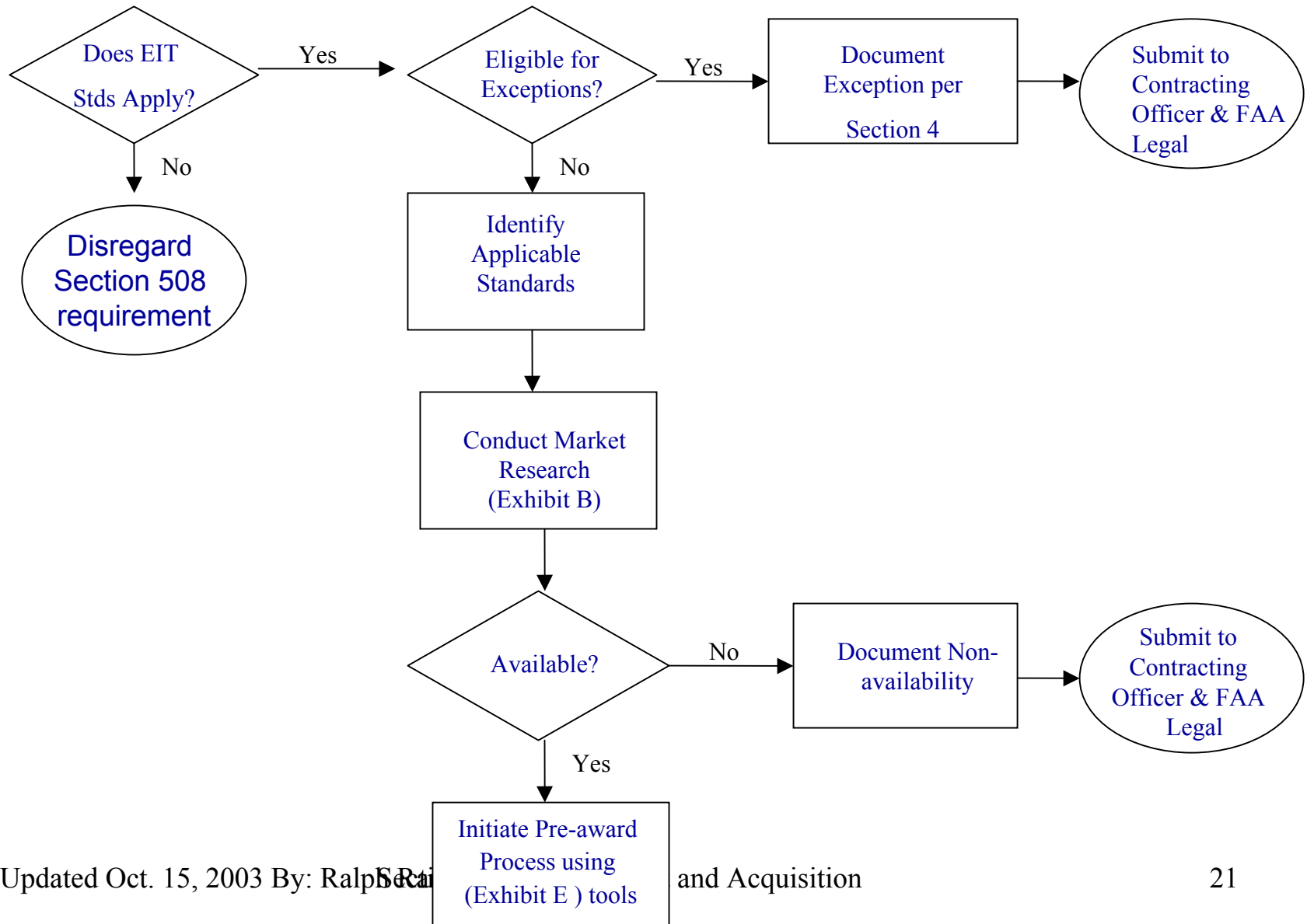
Web Based Training

Step One:

Do the EIT Access Board Technical Standards Apply?

Is the web based training considered electronic and information technology?

Web Based Training

Step Two:

Eligible for Exceptions? (If YES, must document and submit to Contracting Officer & Legal)

- Incidental to Federal contract
- A National Security System
- EIT located in spaces used for maintenance, repair or occasional monitoring of equipment
- EIT that would impose an Undue Burden on FAA

Web Based Training

Step Three:

Identify Applicable Standards

- – Software Applications and Operating Systems
- – Web-Based Information and Applications
- – Telecommunication Products
- – Video and Multimedia Products
- – Self Contained, Closed Products
- – Desktop and Portable Computers

Web Based Training

Step 4:

Conduct Market Research (Exhibit B)

Query Government databases

Review on-line catalogs and product literature

Hold presolicitation conferences

Use technical analysis publications

Review Government-managed web sites

Web Based Training

Step 5:

What would tell you that Web Based Training is Available?

How would you know if a vendor can create a Section 508 Compliant online web based training?

No vendor available - Document Non Availability

Submit to Contracting Office & FAA Legal

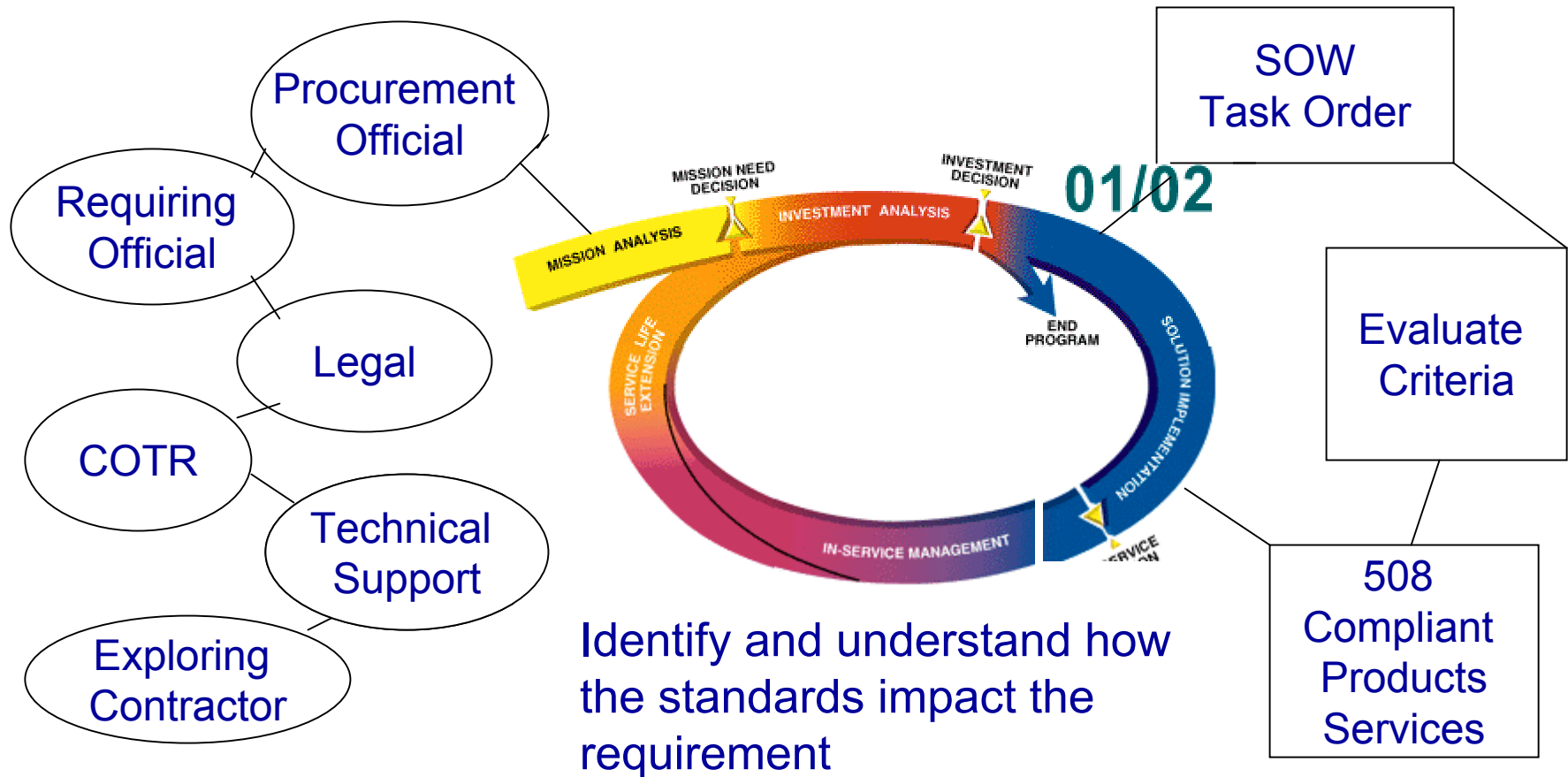If the answer is YES, there is a vendor available then...

Web Based Training

Step 6

Initiate Pre-Award Process Using Procurement Tools (Exhibit E)

- Public Announcement/Market Survey/Screening SIR
- Section C Statement of Work
- Section L Required Submissions
- Section M Evaluation Factors
- Section J EIT Access Board Technical Standards

FAA Working Together

Procurement Official

Requiring Official

Legal

COTR

Technical Support

Exploring Contractor

MISSION NEED DECISION

INVESTMENT DECISION

MISSION ANALYSIS

INVESTMENT ANALYSIS

01/02

SERVICE LIFE EXTENSION

END PROGRAM

SOLUTION IMPLEMENTATION

IN-SERVICE MANAGEMENT

SOW Task Order

Evaluate Criteria

508 Compliant Products Services

Identify and understand how the standards impact the requirement

Section 508 Procurement and Acquisition Resources

- **Buy Accessible:**
  - [FAA Section 508 Procurement](http://interweb.faa.gov/aio/508/index.cfm?section=1033)

    http://interweb.faa.gov/aio/508/index.cfm?section=1033
  - [508 and You - Requiring Official](http://section508.gov/index.cfm?FuseAction=Content&ID=56)
    http://section508.gov/index.cfm?FuseAction=Content&ID=56
  - [Buy Accessible - Government Purchasers](http://section508.gov/index.cfm?FuseAction=Content&ID=106&Method=Print)
    http://section508.gov/index.cfm?FuseAction=Content&ID=106&Method=Print

Section 508 Procurement and Acquisition Resources

- [Section 508 Acquisition FAQ's](#) http://section508.gov/index.cfm?FuseAction=Content&ID=75

- [Voluntary Product Assembly Template](#) http://www.itic.org/policy/vpat.html

- [Buy Accessible – General Information](#) http://section508.gov/index.cfm?FuseAction=Content&ID=2